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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
  
MAY 16 2022  
  
SEAN F. McAVOY, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

10 UNITED STATES DISTRICT COURT  
11 FOR THE EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

2:22-cr-00035-RMP

13 Plaintiff,

INFORMATION SUPERSEDING  
INDICTMENT

14 v.

15 ROSHON EDWARD THOMAS

Vio: 18 U.S.C. § 287

16 Defendant.

False, Fictitious, or Fraudulent  
Claims

17 The United States Attorney charges:

18 General Allegations

19 At all relevant times relevant to this Information Superseding Indictment:

20 1. The Economic Injury Disaster Loan (“EIDL”) program is an SBA  
21 program that provides low-interest funding to small businesses, renters, and  
22 homeowners affected by declared disasters.

23 2. On March 27, 2020, the President signed into law the Coronavirus Aid,  
24 Relief, and Economic Security (“CARES”) Act. That statute, along with the  
25 Coronavirus Preparedness and Response Supplemental Appropriations Act,  
26 authorized the SBA to provide EIDLs to eligible small businesses experiencing  
27 substantial financial disruption due to the COVID-19 pandemic.

1           3.     In order to obtain an EIDL, a qualifying business was required to submit  
2 an application to the SBA providing information about its operations, such as the  
3 number of employees, gross revenues for the 12-month period preceding the disaster,  
4 and cost of goods sold in the 12-month period preceding the disaster. In the case of  
5 EIDLs for COVID-19 relief, the 12-month period was the year preceding January 31,  
6 2020. The application was also required to certify that the information in the  
7 application was true and correct to the best of the applicant's knowledge.

8           4.     The amount of an EIDL, if the application was approved, was determined  
9 based, in part, on the information provided in the application about employment,  
10 revenue, and cost of goods sold. Any funds issued under an EIDL were determined  
11 and issued directly by the SBA. EIDL funds were eligible to be used to payroll  
12 expenses, sick leave, production costs, and business obligations such as debts, rent,  
13 and mortgage payments.

14           5.     In addition to the EIDL loan amount, EIDL applicants could also apply to  
15 obtain cash advances of up to \$10,000 within three days of application. Advances,  
16 which were determined based on the number of employees that the applicant certified  
17 having, did not have to be repaid.

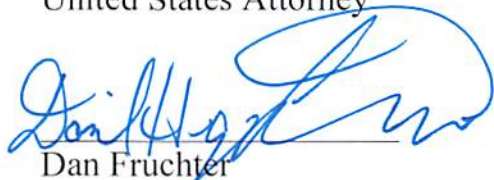
18           6.     On or about July 6, 2020, Defendant ROSHON EDWARD THOMAS  
19 submitted EIDL application number 3308861858 to SBA in the name of his purported  
20 business, Thomas Tattoo Parlor. In the application, Defendant ROSHON EDWARD  
21 THOMAS listed the "primary business address" of the Tattoo Parlor as his residential  
22 address in Spokane, Washington. Defendant ROSHON EDWARD THOMAS stated  
23 that Thomas Tattoo Parlor had been established on June 15, 2018, and was a "Tanning  
24 and Tattoo" business consisting of 10 employees and with gross receipts of \$45,000  
25 for the twelve months ending January 31, 2020. Defendant ROSHON EDWARD  
26 THOMAS certified under penalty of perjury and other criminal penalties that this  
27 information was true and accurate.



1 information submitted by Defendant ROSHON EDWARD THOMAS in support of  
2 EIDL application number 3308861858 was materially false and fraudulent; all in  
3 violation of 18 U.S.C. § 287.

4  
5 Dated this 16th day of May, 2022.

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